ORIGINAL FILE

Before the FEDERAL COMMUNICATIONS COMMISSION Washington. DC 20554

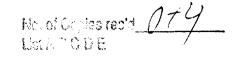
In re)		RECEIVED
Amendment of Section 90.494 of the Commission's Rules)	RM-7986	AUG 1 8 1992
and Regulation concerning shared use of 900 MHz Paging Frequencies))		FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

To: The Commission

SUPPLEMENT TO REPLY COMMENTS OF DIAL PAGE, L.P. IN OPPOSITION TO PETITION FOR RULEMAKING

Dial Page, L.P. ("Dial Page"), by its attorneys and pursuant to Rule Section 1.401 et seg., supplements its comments in reply to the comments submitted on the Private Carrier Paging Section of the National Association of Business and Educational Radio, Inc.'s ("NABER") above captioned petition for rulemaking, and shows the following:

- 1. In its comments and reply comments in this proceeding, Dial Page urged the Commission not to institute exclusive use of 929 MHz private carrier paging ("PCP") frequencies. Dial Page showed that only a few large carriers would benefit from NABER's proposal for exclusive use of 929 MHz PCP frequencies, and that many small carriers would suffer from being unable to expand their systems.
- 2. Indeed, Dial Page suggested that should the Commission determine to award exclusive use of the 929 MHz PCP frequencies, that shortly after the revised rules become effective, in the more populated MSAs in the country, few, if any, 929 MHz PCP frequencies would be left. As a result, there would be



inadequate spectrum available either to relieve overcrowding in the lower PCP bands or for the future expansion needs of PCP carriers.

- As Dial Page's comments and reply comments explained, the history of licensing of the 37 local common carrier paging channels in the 931 MHz band suggest what is likely to happen with the 929 MHz frequencies. With the 931 MHz frequencies, there was a land-rush of applications, motivated largely by speculation rather than regard for public service. The Commission's records now show the general lack of available 931 MHz paging channels in the more populated market areas of the Dial Page suggested that monitoring of many of those frequencies would show that although there are a large number of licensed and presumably constructed facilities, they are not in in use. Dial Page suggested the propriety of fact Commission's Field Operations Bureau conducting monitoring operations in selected major markets to confirm the current warehousing of 931 MHz common carrier spectrum; and Dial Page further suggested the Commission should defer any action on NABER's petition pending the results of that study. 1/
- 4. In addition, Dial Page's comments warned that what happened with respect to the 931 MHz frequencies is equally likely to happen to the 929 MHz frequencies if the Commission

Dial Page suggested that these licenses are being held for no reason other than speculation, with their licensees hoping they can be sold at a profit to other licensees which need those channels for expansion or growth of their paging systems.

grants exclusivity on them. If this valuable spectrum is gobbled up by speculation, it will be unavailable for some lengthy time to carriers actually intending to provide PCP service, and that service will, in turn, be unavailable, or restricted, to the public which needs that service.

- 5. To determine whether it was correct that a substantial number of putatively licensed facilities in the 931 MHz band were not in fact being operated, Dial Page conducted a study in the Tampa, Florida area, one of the larger markets in the United States. Dial Page has a considerable presence in that market and provides a regional paging service on 931.3375 MHz throughout most of the State of Florida.2/
- 6. The Commission's Public Mobile Service database, as of April 1, 1992, showed that of the 37 local 931 MHz paging channels, only four failed to show any facilities authorized or applied for within 12 miles of Dial Page's Tampa headquarters, located at 3715 Spruce Street, Tampa, Florida. A copy of the April 1. 1992 staff study is attached as Exhibit I.
- 7. To determine whether these facilities were in use, Dial Page, on June 30, 1992, monitored each of the 931 MHz frequencies for activity. As the Declaration of Dial Page Tampa District Manager Jeffrey Donahue shows, all monitoring was done between the hours of 11 am and 5 pm. Each frequency was monitored at least five minutes before a conclusion was made that the channel

^{2/} Indeed, Dial Page has recently obtained authority to expand that operation throughout the southeast and southern United States.

was not active. <u>See</u> Declaration of Jeffrey Donahue. As the report contained in Mr. Donahue's declaration shows, only 11 of the 37 channels monitored showed paging activity. As discussed above, four channels appear from the FCC's database to have no applications pending or facilities authorized within 20 miles of Dial Page's Tampa headquarters. <u>3</u>/ Dial Page's monitoring showed that no paging activity was occurring on the 22 other 931 MHz channels. Id.

- 8. Comparison of the April 1, 1992 staff study with the data contained in Mr. Donahue's declaration further shows that three of the channels on which no paging activity was found appear to have applications pending, but no existing authorizations. Eight of the channels having no activity appear to be channels where the authorized facilities may not have been built. 4/However, at least 11 of those channels appear to be fully authorized and thus should be providing service. 5/
- 9. That at least 11 of the 37 Public Mobile Service 931 MHz channels have authorized facilities in the Tampa area and yet

^{3/} Of those four channels, one, 931.0375 MHz shows no applications anywhere in the State of Florida. As to the other three, a statewide search of the FCC database shows only a few authorized facilities on any of these channels, giving some indication that their licensees also may not be using the facilities for any purpose other than warehousing.

This is evident because the authorizations for these facilities appear to have terminated (thus indicating that facilities were not built and/or not covered with the filing of an FCC Form 489), or the time period in which to build and cover the facilities has not expired.

^{5/} This is indicated because there appears to be a license good to April 1, 1999 issued for each of these facilities.

are apparently not providing service, strongly supports Dial Page's claim that there is a substantial amount of frequency warehousing occurring with respect to 931 MHz facilities. 6/ That fact, in turn, supports Dial Page's argument that adoption of exclusive use of 929 MHz PCP channels is likely to lead to similar warehousing of those channels. 7/

10. The comments and reply comments submitted in this proceeding clearly point out the need for the Commission to insure that adequate spectrum is available for the future growth and development of the PCP service. Those comments do not support a conclusion that adoption of NABER's proposal for exclusive use of the 929 MHz PCP channels is the appropriate or an effective method of achieving those goals. Rather, it appears that exclusive use of the 929 MHz channels will harm, rather than

 $[\]underline{6}$ / Dial Page suggests that monitoring in other large markets will show similar results.

It is, of course, possible that one or two of these channels is actually in use, but was down on the day of monitoring because of a malfunction. It is extremely unlikely that all 11 were malfunctioning at the same time. Perhaps Tampa would be a good place for the FOB to begin monitoring.

help, the PCP service. Accordingly, Dial Page requests that the Commission deny NABER's rulemaking petition.

Respectfully submitted,

DIAL PAGE, L.P.

Gerald S. McGowan George L. Lyon, Jr.

Its Attorneys

Lukas, McGowan, Nace and Gutierrez, Chartered 1819 H Street, N.W., 7th Floor Washington, D.C. 20006

(202) 857-3500

August 18, 1992

EXHIBIT I

FCC Staff Study List as of: April 1, 1992 08-13-92 17:28

Search Frequencies: 900MHz

Search Area #1: Tampa, FL (Tampa)

20 mile radius of 27@[57'34"N.Lat 82@[30'16"W.Long

(From 27@[10'08" 81@[40'38" To 28@[45'00" 83@[19'54")

Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing Applicant/Licensee File Number Tampa

82.38.31 28.03.23 FL KNKE589 AUTH 10/05/89 04/01/99 10.7 METROCALL OF DELAWARE, INC. 22496-CD-R-(01)-89 308.5©[

Summary of search results-- Search: Tampa

Closest matching record: 10.7
Number of matching records: 1

82.27.35 27.56.50 FL KNKK239 AUTH 09/11/91 04/01/99 2.9 ABRAHAM COMMUNICATIONS, INC. 29029-CD-ML-(01)-91 107.10

82.39.21 28.02.21 FL KNKK239 AUTH 09/11/91 04/01/99 10.8 ABRAHAM COMMUNICATIONS, INC. 29029-CD-ML-(01)-91 300.7©[

82.41.57 27.49.52 FL KNKK239 AUTH 09/11/91 04/01/99 14.8

ABRAHAM COMMUNICATIONS, INC. 29029-CD-ML-(01)-91 233.40[

Summary of search results-- Search: Tampa Closest matching record: 2.9

Number of matching records: 3

82.27.35 27.56.50 FL KNKG394 AUTH 02/12/85 04/01/89 2.9 ABELL COMMUNICATIONS CORPORATION 24986-CD-ML-(01)-84 107.1©[

82.27.34 27.57.41 FL KNKM265 AUTH 03/23/92 03/23/93 2.8 ARCH SOUTHEAST COMMUNICATIONS, INC. 27746-CD-P/ML-(01)-91 87.20[

82.27.35 27.56.50 FL KNKM265 AUTH 08/24/90 08/24/91 2.9 ARCH SOUTHEAST COMMUNICATIONS, INC. 28685-CD-P/L-(01)-89 107.1©[

FREQUENCY SEARCH RESULTS	Page 2
FCC Staff Study List as of: April 1, 1992	08-13-92 17:28
Longitude Latitude State CallSign Status Grant PN/ExpDt Applicant/Licensee File Number	Distance & Bearing Tampa
************************* End of 931.0875 MHz ********** 3 matching records within the requested search are	
Summary of search results Search: Tampa Closest matching record: 2.8 Number of matching records: 3 ************************************	******
**************************************	*****
82.27.35 27.56.50 FL KNKK885 PEND 01/22/92	2.9
22468-CD-P/ML-(01)-92 ASSOCIATED COMMUNICATIONS GROUP, INC.	107.1©[
82.27.35 27.56.50 FL KNKK885 AUTH 06/29/88 06/29/89 ASSOCIATED COMMUNICATIONS GROUP, INC. 23599-CD-P/L-(01)-88	2.9 107.1©[
************************* End of 931.1625 MHz ********** 2 matching records within the requested search are	
Summary of search results Search: Tampa Closest matching record: 2.9 Number of matching records: 2 ************************************	******
**************************************	******
82.27.34 27.56.48 FL KNKG568 AUTH 06/03/88 06/03/89 CHICAGO COMMUNICATIONS, INC. 22528-CD-P/L-(01)-88	2.9 107.7©[
82.27.34 27.56.48 FL KNKG568 AUTH 06/03/88 06/03/89 RMM COMMUNICATIONS, INC. 22528-CD-P/L-(01)-88	2.9 107.7©[
************************ End of 931.1875 MHz ********* 2 matching records within the requested search are	
Summary of search results Search: Tampa Closest matching record: 2.9	

2

82.27.33 27.56.46 FL PEND 05/02/90 2.9 BEEP ALERT 23772-CD-P/L-(01)-90 108.3@[

Closest matching record: Number of matching records:

08-13-92 17:28

Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing Applicant/Licensee File Number Tampa

*******	End of 931.2125 MHz	********
1 matching record	within the requested	search area

Summary of search results-- Search: Tampa
Closest matching record: 2.9
Number of matching records: 1

82.27.35	27.56.50	FL	KNKK600	AUTH	06/02/88	06/02/89		2.9
PRIORITY	COMMUNICATION	s, I	NC.	22	2073-CD-P	/L-(01)-88	=	107.10[

82.28.14 28.11.21 FL KNKK620 AUTH 06/14/91 06/14/92 16.0 PRIORITY COMMUNICATIONS, INC. 20906-CD-P/ML-(01)-91 7.5©[

82.29.26 27.54.19 FL KNKK600 AUTH 03/01/90 03/01/91 3.8 PRIORITY COMMUNICATIONS, INC. 20759-CD-P/ML-(01)-90 167.2©[

82.38.07 27.46.22 FL KNKK620 AUTH 06/14/91 06/14/92 15.1 PRIORITY COMMUNICATIONS, INC. 20922-CD-P/ML-(01)-91 211.9©[

82.39.29 28.02.20 FL KNKK605 AUTH 08/23/90 08/23/91 10.9 PRIORITY COMMUNICATIONS, INC. 22486-CD-P/ML-(01)-90 300.2©[

Summary of search results-- Search: Tampa
Closest matching record: 2.9
Number of matching records: 5

82.24.56	28.04.04	FL KP	A411 AUTH	02/28/90	02/28/91	9.2
MOBILECOMM	OF FLORIDA,	INC.	29	756-CD-P/M	L-(01)-89	36.1@[

82.27.33 27.56.46 FL KPA411 AUTH 02/28/90 02/28/91 2.9 MOBILECOMM OF FLORIDA, INC. 29758-CD-P/ML-(01)-89 108.3©[

82.39.21 28.02.21 FL KPA411 AUTH 02/28/90 02/28/91 10.8 MOBILECOMM OF FLORIDA, INC. 29754-CD-P/ML-(01)-89 300.7©[

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Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing File Number Tampa Applicant/Licensee

************************ End of 931.2625 MHz ******************** 3 matching records within the requested search area

Summary of search results-- Search: Tampa Closest matching record: 2.9 Number of matching records: 3

*********	**** 931.2875 MHz **********	******
82.27.34 27.56.48 FL PAGING NETWORK OF FLORIDA,	KNKK353 AUTH 08/23/90 08/23/91 INC. 23234-CD-P/ML-(01)-91	2.9 107.7©[
82.27.35 27.56.50 FL PAGING NETWORK OF FLORIDA,	KNKK353 AUTH 12/20/88 12/20/89 INC. 28570-CD-P/L-(01)-88	2.9 107.1©[
82.28.14 28.11.21 FL PAGING NETWORK OF FLORIDA,	KNKK353 PEND 01/08/92 INC. 21861-CD-P/ML-(01)-92	16.0 7.5©[
82.29.39 27.41.17 FL PAGING NETWORK OF FLORIDA,	KNKK353 PEND 01/08/92 INC. 21868-CD-P/ML-(01)-92	18.7 178.1©[
82.38.07 27.46.22 FL PAGING NETWORK OF FLORIDA,	KNKK353 AUTH 12/20/88 12/20/89 INC. 28570-CD-P/L-(01)-88	15.1 211.9©[
82.40.06 27.47.41 FL PAGING NETWORK OF FLORIDA,	KNKK353 PEND 01/08/92 INC. 21874-CD-P/ML-(01)-92	15.1 221.5©[
82.41.03 28.00.54 FL PAGING NETWORK OF FLORIDA,	KNKK353 PEND 01/08/92 INC. 21851-CD-P/ML-(01)-92	11.6 289.2©[
82.47.30 27.57.26 FL PAGING NETWORK OF FLORIDA,	KNKK353 PEND 01/08/92 INC. 21909-CD-P/ML-(01)-92	17.6 269.5©[

*********************** End of 931.2875 MHz ********************* 8 matching records within the requested search area

Summary of search results-- Search: Tampa Closest matching record: 2.9 Number of matching records: 8

************************** 931.3125 MHz ***********************

FL KNKK353 AUTH 10/09/91 04/01/99 82.27.34 27.56.48 2.9 PAGING NETWORK OF FLORIDA, INC. 25834-CD-ML-(01)-91 107.79[

82.38.07 FL KNKK353 AUTH 10/09/91 04/01/99 27.46.22 15.1 PAGING NETWORK OF FLORIDA, INC. 25834-CD-ML-(01)-91 211.99[

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Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing Applicant/Licensee File Number Tampa

*********************** End of 931.3125 MHz ******************* 2 matching records within the requested search area

Summary of search results-- Search:

Tampa

Closest matching record:

2.9

Number of matching records:

2 ******************************

*****	******	****	**** 931.3375 MHz ***********	******
82.22.09 DIAL PAGE	27.57.59	FL	KNKG601 AUTH 12/03/91 04/01/99 21566-CD-ML-(01)-92	8.3 86.7©[
82.27.27 DIAL PAGE	27.59.37	FL	KNKG601 AUTH 12/03/91 04/01/99 21566-CD-ML-(01)-92	3.7 50.7©[
82.29.39 DIAL PAGE	27.41.17	FL	KNKG601 AUTH 12/03/91 04/01/99 21566-CD-ML-(01)-92	18.7 178.1©[
82.38.32	28.03.23	\mathtt{FL}	KNKG601 AUTH 12/03/91 04/01/99	10.7

DIAL PAGE 21566-CD-ML-(01)-92 308.49[82.40.10 27.47.52 FLKNKG601 AUTH 12/03/91 04/01/99 15.0 DIAL PAGE 21566-CD-ML-(01)-92 222.29[

*********************** End of 931.3375 MHz ******************* 5 matching records within the requested search area

Summary of search results-- Search: Tampa

Closest matching record:

3.7

Number of matching records: 5

********** 931.3625 MHz ********************

82.27.32 27.57.06 PEND 06/19/91 FL2.8 25689-CD-P/L-(01)-91 NEW ERA COMMUNICATIONS, INC. 100.90[

82.27.31 27.57.06 FL KNKM278 AUTH 03/14/90 03/14/91 2.9 30293-CD-P/L-(01)-89 TENQUE AMERICA, LTD. 100.80[

*********************** End of 931.3625 MHz ******************* 2 matching records within the requested search area

Summary of search results-- Search: Tampa 2.8

Closest matching record: Number of matching records: 2

FREQUENCY SEARCH RESULTS PA	age 6
FCC Staff Study List as of: April 1, 1992 08-13-92	17:28
Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bo Applicant/Licensee File Number Tampa	earing
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82.27.35 27.56.50 FL KNKL657 AUTH 05/09/89 05/09/90 2.9 CUTLER COMMUNICATIONS, INC. 22353-CD-P/L-(01)-89 107.1©	
82.45.50 27.50.50 FL KNKL657 AUTH 10/15/91 04/01/99 17.7 CUTLER COMMUNICATIONS, INC. 20767-CD-ML-(01)-92 244.0©	[
************************** End of 931.3875 MHz ***********************************	****
Summary of search results Search: Tampa Closest matching record: 2.9 Number of matching records: 2	
******************	****
**************************************	****
82.38.31 28.03.23 FL KNKF273 AUTH 09/24/84 04/01/89 10.7 COMSTAR INC 22310-CD-L-(01)-84 308.5©	
************************* End of 931.4125 MHz ***********************************	****
Summary of search results Search: Tampa Closest matching record: 10.7 Number of matching records: 1 ************************************	
**************************************	****
**************************************	****
82.27.33 27.56.46 FL KNKL368 AUTH 11/13/89 04/01/99 2.9 MTEL PAGING, INC. 20670-CD-ML-(01)-90 108.3©	
82.37.27 27.52.00 FL KNKL368 AUTH 11/15/88 11/15/89 9.7 COM/NAV MARINE, INC. 25686-CD-P/L-(01)-88 228.9©	
82.45.50 27.50.50 FL KNKL368 AUTH 11/13/89 04/01/99 17.7 MTEL PAGING, INC. 20670-CD-ML-(01)-90 244.0©	
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Summary of search results -- Search: Tampa
Closest matching record: 2.9
Number of matching records: 3

FREQUENCY SEARCH RESULTS	Page 7
FCC Staff Study List as of: April 1, 1992	08-13-92 17:28
Longitude Latitude State CallSign Status Grant PN/ExpDt Applicant/Licensee File Number	Distance & Bearing Tampa
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82.27.33 27.56.46 FL KNKK849 AUTH 03/02/90 03/02/91 RADIO RELAY-DIGITAL PAGING CORP. 28690-CD-P/ML-(01)-89	2.9 108.3©[
************************ End of 931.4625 MHz ********** 1 matching record within the requested search area	
Summary of search results Search: Tampa Closest matching record: 2.9 Number of matching records: 1 ************************************	*****
**************************************	******
82.27.33 27.56.46 FL KNKF817 AUTH 09/20/91 04/01/99 AMERICAN PAGING INC OF FLORIDA 27821-CD-ML-(01)-91	
82.28.14 28.11.21 FL KNKF817 AUTH 09/20/91 04/01/99 AMERICAN PAGING INC OF FLORIDA 27821-CD-ML-(01)-91	16.0 7.5©[
82.29.39 27.41.17 FL KNKF817 AUTH 09/20/91 04/01/99 AMERICAN PAGING INC OF FLORIDA 27821-CD-ML-(01)-91	18.7 178.1⊕[
82.40.06 27.47.41 FL KNKF817 AUTH 09/20/91 04/01/99 AMERICAN PAGING INC OF FLORIDA 27821-CD-ML-(01)-91	15.1 221.5©[
82.47.30 27.57.26 FL KNKF817 AUTH 09/20/91 04/01/99 AMERICAN PAGING INC OF FLORIDA 27821-CD-ML-(01)-91	17.6 269.5©[
************************* End of 931.4875 MHz ********** 5 matching records within the requested search are	
Summary of search results Search: Tampa Closest matching record: 2.9 Number of matching records: 5 ************************************	*****
**************************************	******
82.45.50 27.50.50 FL KNKM578 AUTH 08/23/90 08/23/91 CUTLER COMMUNICATIONS, INC. 30077-CD-P/L-(01)-89	17.7 244.0©[
82.13.03 28.00.01 FL KNKF817 PEND 01/30/91 22024-CD-P/ML-(01)-91 AMERICAN PAGING, INC, (OF CALIFORNIA)	17.8 80.9©[

82.27.33 27.56.46 FL KNKF817 PEND

AMERICAN PAGING, INC, (OF CALIFORNIA)

END 01/30/91 2.9 22024-CD-P/ML-(01)-91 108.3@[

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FCC Staff Study List as of: April 1, 1992	08-13-92 17:28
Longitude Latitude State CallSign Status Grant PN/ExpDt Applicant/Licensee File Number	Distance & Bearing Tampa
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82.28.24 28.11.21 FL KNKF817 PEND 01/30/91 22024-CD-P/ML-(01)-91	15.9 6.9©[
AMERICAN PAGING, INC, (OF CALIFORNIA)	
82.29.39 27.41.17 FL KNKF817 PEND 01/30/91 22024-CD-P/ML-(01)-91	18.7 178 101
AMERICAN PAGING, INC, (OF CALIFORNIA)	170.19[
82.40.06 27.47.41 FL KNKF817 PEND 01/30/91 22024-CD-P/ML-(01)-91	
AMERICAN PAGING, INC, (OF CALIFORNIA)	221.5⊌[
************************ End of 931.5125 MHz ********* 6 matching records within the requested search ar	
Summary of search results Search: Tampa Closest matching record: 2.9	
Number of matching records: 6 ************************************	*****
**************************************	******
82.27.33 27.56.46 FL KNKL717 AUTH 08/09/90 04/01/99 CIAMPA, N. ANTHONY 27425-CD-ML-(01)-90	2.9 108.3©[
********************************** End of 931.5375 MHz ********	-
1 matching record within the requested search are	
Summary of search results Search: Tampa Closest matching record: 2.9	
Number of matching records: 1	
**************************************	*****
82.27.35 27.56.50 FL KNKE296 AUTH 10/18/90 04/01/99 CHICAGO COMMUNICATIONS SERVICE INC 27758-CD-R-(01)-89	2.9 107.1@[
82.38.07 27.46.22 FL KNKE296 AUTH 04/26/89 04/26/90 CHICAGO COMMUNICATIONS SERVICE, INC. 27023-CD-P/ML-(01)-88	15.1 211.9@[
************************* End of 931.5625 MHz ********* 2 matching records within the requested search ar	
Summary of search results Search: Tampa	
Closest matching record: 2.9 Number of matching records: 2	
******************	*****

FCC Staff Study List as of: April 1, 1992 08-13-92 17:28
Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing Applicant/Licensee File Number Tampa

82.40.18 27.53.15 FL KNKO401 AUTH 01/13/92 01/13/93 11.4 PACTEL PAGING 32110-CD-P/L-(01)-89 244.2©[

Summary of search results Search: Tampa Closest matching record: 11.4 Number of matching records: 1 ************************************

82.27.33 27.56.46 FL KNKK902 AUTH 03/10/88 03/10/89 2.9 PAGEAIR, INC. 22002-CD-P/L-(01)-88 108.3©[
82.38.31 28.03.23 FL KNKM586 AUTH 08/29/90 08/29/91 10.7 PAGEAIR, INC. 24443-CD-P/L-(01)-89 308.5©[

Summary of search results Search: Tampa Closest matching record: 2.9 Number of matching records: 2 ************************************

82.27.35 27.56.50 FL KNKL644 AUTH 05/02/90 04/01/99 2.9 CLASSIC VENTURES DIVERSIFIED, INC. 24986-CD-ML-(01)-90 107.1@[

Summary of search results Search: Tampa Closest matching record: 2.9 Number of matching records: 1 ************************************

82.27.34 27.56.48 FL KNKM325 AUTH 04/05/90 11/14/91 2.9 AREA PAGING, INC. 22360-CD-P/L-(01)-89 107.7©[

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FCC	Staff	Study	List	as	of:	April	1 -	1992

08-13-92 17:28

Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing Applicant/Licensee File Number Tampa

Summary of search results-- Search: Tampa
Closest matching record: 2.9
Number of matching records: 1

82.27.35 27.56.50 FL KNKK353 AUTH 06/03/88 10/30/89 2.9 PAGING NETWORK OF FLORIDA, INC. 28536-CD-MP-(01)-89 107.1©[

82.27.34 27.56.48 FL KNKK353 AUTH 10/09/91 04/01/99 2.9 PAGING NETWORK OF FLORIDA, INC. 25834-CD-ML-(01)-91 107.70

82.38.07 27.46.22 FL KNKK353 AUTH 06/03/88 10/30/89 15.1 PAGING NETWORK OF FLORIDA, INC. 28536-CD-MP-(01)-89 211.9©[

Summary of search results-- Search: Tampa Closest matching record: 2.9

82.27.35 27.56.50 FL KNKM585 AUTH 08/29/90 08/29/91 2.9 ECG ENTERPRISES, INC. 28834-CD-P/L-(01)-89 107.1©[

Summary of search results-- Search: Tampa
Closest matching record: 2.9
Number of matching records: 1

82.27.34 27.56.48 FL KNKM325 PEND 03/01/89 2.9 AREA PAGING, INC. 22360-CD-P/L-(01)-89 107.7©[

FCC Staff Study List as of: Apri	т т,	, 1992	2
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08-13-92 17:28

Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing Applicant/Licensee File Number Tampa

Summary of search results-- Search:

Tampa

Closest matching record:

2.9

Number of matching records:

82.27.35 27.56.50 FL KNKK633 AUTH 03/02/90 03/02/91 2.9 SUNSHINE BEEPER COMPANY 20173-CD-P/ML-(01)-90 107.10

Summary of search results-- Search: Tampa

Closest matching record: 2.9

Number of matching records: 1

82.24.56 28.04.04 FL KPA411 AUTH 12/14/88 12/14/89 9.2 MOBILECOMM OF FLORIDA, INC. 27875-CD-P/ML-(01)-88 36.1©[

82.27.33 27.56.46 FL KPA411 AUTH 12/08/88 12/08/89 2.9 MOBILECOMM OF FLORIDA, INC. 20591-CD-P/ML-(01)-88 108.3©[

82.27.34 27.57.41 FL KPA411 AUTH 10/30/91 04/01/99 2.8 MOBILECOMM OF FLORIDA, INC. 22496-CD-ML-(01)-92 87.2©[

82.38.01 27.46.13 FL KPA411 AUTH 10/30/91 04/01/99 15.2 MOBILECOMM OF FLORIDA, INC. 22496-CD-ML-(01)-92 211.3©[

82.39.21 28.02.21 FL KPA411 AUTH 10/30/91 04/01/99 10.8 MOBILECOMM OF FLORIDA, INC. 22496-CD-ML-(01)-92 300.7©[

82.45.50 27.50.50 FL KPA411 AUTH 10/30/91 04/01/99 17.7 MOBILECOMM OF FLORIDA, INC. 22496-CD-ML-(01)-92 244.0@[

Summary of search results-- Search: Tampa

Closest matching record: 2.8

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5.0 97.3@[

3.1

105.50[

15.0

222.2©[

Longitude Latitude St Applicant/License		Status Grant PN/ExpDt File Number	Distance & Bearing Tampa
******	****** 93	1.8375 MHz **********	******
82.19.23 27.59.34 GENCOM, INCORPORATED	FL KPA425	AUTH 10/09/90 04/01/99 21904-CD-ML-(01)-92	11.3 78.3©[
82.27.39 28.06.20 GENCOM, INCORPORATED	FL KPA425	AUTH 10/09/90 04/01/99 21904-CD-ML-(01)-92	10.4 14.8©[
82.28.57 27.55.33 GENCOM, INCORPORATED	FL KPA425	AUTH 10/09/90 04/01/99 21904-CD-ML-(01)-92	2.7 149.9©[
82.29.39 27.41.17 PACTEL PAGING	FL KPA425	PEND 03/11/92 23512-CD-P/ML-(01)-92	18.7 178.1©[
82.29.39 27.41.17 PACTEL PAGING	FL KPA425	AUTH 03/01/90 03/01/91 20756-CD-P/ML-(01)-90	18.7 178.1©[
82.41.57 27.49.51 GENCOM, INCORPORATED	FL KPA425	AUTH 10/09/90 04/01/99 21904-CD-ML-(01)-92	14.8 233.4©[
82.41.57 27.49.52 GENCOM, INCORPORATED	FL KPA425	AUTH 10/09/90 04/01/99 21904-CD-ML-(01)-92	14.8 233.4@[
82.45.32 28.07.48 GENCOM, INCORPORATED	FL KPA425	AUTH 10/09/90 04/01/99 21904-CD-ML-(01)-92	19.5 307.1©[
82.47.30 27.57.56 GENCOM, INCORPORATED	FL KPA425	AUTH 10/09/90 04/01/99 21904-CD-ML-(01)-92	17.6 271.4©[
*********** 9 matching		of 931.8375 MHz ******** in the requested search a	
Number of	matching rematching rec	cord: 2.7	

******	****** 93	1.8625 MHz **********	******

82.25.26 27.57.01 FL KNKD463 AUTH 09/23/84 04/01/89 METROMEDIA TELECOMMUNICATIONS INC 22252-CD-L-(01)-84

82.27.21 27.56.51 FL KNKK843 AUTH 10/18/91 04/01/99

82.40.10 27.47.52 FL KNKD385 AUTH 09/23/84 04/01/89

METROMEDIA TELECOMMUNICATIONS INC 22254-CD-L-(01)-84

MCCAW 900 MHZ COMMUNICATIONS, INC. 20753-CD-ML-(01)-92

FCC Staff Study List as of: April 1,	1992
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Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing Applicant/Licensee File Number Tampa

Summary of search results-- Search: Tampa
Closest matching record: 3.1
Number of matching records: 3

82.39.49 28.02.25 FL KNKF868 AUTH 05/21/84 04/01/89 11.2 MILLICOM INFORMATIONS SERVICES INC 23075-CD-MP/L-(01)-84 299.8©[

82.39.29 28.02.20 FL KNKM445 AUTH 05/31/90 05/31/91 10.9 META RCC, INC. 29550-CD-P/L-(01)-89 300.2©[

Summary of search results-- Search: Tampa
Closest matching record: 10.9
Number of matching records: 2

82.19.38 27.44.19 FL KNKK849 PEND 11/14/90 18.7 RADIO RELAY-DIGITAL PAGING CORP. 20509-CD-P/ML-(01)-91 144.5@[

82.27.45 28.11.30 FL KNKK849 PEND 12/19/90 16.2 RADIO RELAY DIGITAL PAGING CORP. 21167-CD-P/ML-(01)-91 9.1©[

82.27.33 27.56.46 FL KNKK849 AUTH 07/30/90 04/01/99 2.9 RADIO RELAY-DIGITAL PAGING CORPORATION 27768-CD-ML-(01)-90 108.30

82.28.14 28.11.21 FL KNKK849 AUTH 03/01/90 03/01/91 16.0 RADIO RELAY-DIGITAL PAGING CORP. 31897-CD-P/ML-(01)-89 7.5©[

82.37.27 27.52.00 FL KNKK849 PEND 11/14/90 9.7 RADIO RELAY-DIGITAL PAGING CORP. 20509-CD-P/ML-(01)-91 228.9©[

82.46.54 27.54.09 FL KNKK849 AUTH 08/09/90 08/09/91 17.4 RADIO RELAY-DIGITAL PAGING CORP. 31903-CD-P/ML-(01)-89 257.00

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Longitude Latitude State CallSign Status Grant PN/ExpDt Distance & Bearing Applicant/Licensee File Number Tampa

Summary of search results-- Search:

Tampa

Closest matching record:

2.9

Number of matching records:

6

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Search Frequencies: 900MHz

Search Area #1: Tampa, FL

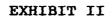
rea #1: Tampa, FL (Tampa)
20 mile radius of 27@[57'34"N.Lat 82@[30'16"W.Long
(From 27@[10'08" 81@[40'38" To 28@[45'00" 83@[19'54")

***** Summary of Results ****************

Frequency	Page No.	Number of Records	Closest Record Tampa
900.0000			None
931.0000			None
931.0125	1	1	10.7
931.0375	-	-	None
931.0625	1	3	2.9
331.0023	-	3	2.5
931.0875	1	3	2.8
931.1125			None
931.1375			None
931.1625	2	2	2.9
931.1875	2	2	2.9
931.2125	2	1	2.9
931.2375	3	5	2.9
931.2625	3	3	2.9
931.2875	4	8	2.9
931.3125	4	2	2.9
931.3375	5	5	3.7
931.3625	5	2	2.8
931.3875	5	2	2.9
931.4125	6	1	10.7
931.4375	6	3	
931.43/5	6	3	2.9
931.4625	6	1	2.9
931.4875	7	5	2.9
931.5125	7	6	2.9
931.5375	8	1	2.9
931.5625	8	2	2.9
021 5075	0	1	11 4
931.5875	8	1	11.4
931.6125	9	2	2.9
931.6375	9	1	2.9
931.6625	9	1	2.9
931.6875	10	3	2.9
931.7125	10	1	2.9
931.7375	10	1	2.9
931.7625			None
931.7875	11	1	2.9
931.8125	11	6	2.8
		=	· -

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Frequency	Page No.	Number of Records	Closest Record Tampa
931.8375	11	9	2.7
931.8625	12	3	3.1
931.9625	13	2	10.9
931.9875	13	6	2.9
Totals		95	2.7



DECLARATION OF JEFFREY DONAHUE

Jeffrey Donahue, under penalty of perjury, deposes and states as follows:

- 1. I am employed by Dial Page, L.P. as the Tampa District General Manager. I am making this declaration for submission to the Federal Communications Commission to support. Dial Page's Supplement to its Reply Comments concerning the proposal of the National Association of Business and Educational Radio, Inc. to grant exclusive use of 929 MHz Private Carrier Paging channels.
- 2. At the request of Dial Page's corporate headquarters, on June 30, 1992, I supervised the monitoring of all 37 local Public Land Mobile Radio Service 931 MHz channels to determine whether these channels were in use in the Tampa area.
- 3. Monitoring was done from the Tampa headquarters, located at coordinates 27-57-34 N. Lat., 82-30-16 W. Long. Each frequency was monitored for at least five minutes prior to concluding there was no activity present on the frequency. All monitoring was done between the hours of 11:00 a.m. and 5:00 p.m. Activity was found to be present only on the following channels:
 - 1. 931,0625
 - 2. 931,3375
 - 3. 931.4375
 - 4. 931.4625
 - 5. 931,4875
 - 6. 931.5125
 - 7. 931.5375
 - 8. 931.6875
 - 9. 931.8125
 - 10. 931.8375
 - 11. 931.8625

Activity was also found on the three nationwide paging channels. Our monitoring did not detect paging transmissions on any other 931 MHz channel.

The foregoing statement, given under penalty of perjury is true and correct to the best of my knowledge and belief.

Jeffrey Donahue

August 17, 1992